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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

MARIELA AGUILAR VELAZQUEZ, on	)	Case No. 2:21-cv-02375-MCE-DB
behalf of herself and all others similarly	)	
situated,	)	
	)	<b>JOINT STATUS REPORT AND</b>
Plaintiff,	)	<b>STIPULATION AND</b>
	)	<b>ORDER TO FURTHER</b>
vs.	)	<b><u>STAY CASE DEADLINES</u></b>
	)	
ALLY BANK,	)	The Honorable Morrison C. England, Jr.
	)	
Defendant.	)	
	)	
	)	

1 Pursuant to the Court's order (ECF No. 27), Defendant, Ally Bank, and Plaintiff,  
2 Mariela Aguilar Velazquez (together, the "Parties"), respectfully submit this joint report on the status  
3 of the Parties' settlement discussions.

4 On January 27, 2022, the Court entered an order granting the Parties' Stipulation and  
5 Order Pursuant to Local Rule 144(a) For Extension of Time to Respond to Complaint (ECF No. 11).  
6 Subsequently, on March 16, April 22, June 1, July 12, and August 23, 2022, the Court entered orders  
7 granting the Parties' Stipulation and Order to Stay Case Deadlines (ECF Nos. 16, 18, 20, 24, 27) to  
8 enable the Parties to engage in settlement discussions and explore resolution of the case without  
9 litigation.

10 On June 27, 2022, the Court entered an order granting the Parties' Protective Order and  
11 Confidentiality Agreement Concerning Confirmatory Discovery (ECF No. 22).

12 The Parties have exchanged further settlement offers and confirmatory discovery, and  
13 settlement discussions are ongoing. Accordingly, the Parties believe that good cause exists for a  
14 further extension of the case deadlines, which will conserve the Court's and Parties' resources and  
15 allow the Parties further time to discuss a potential settlement and, if necessary, conduct confirmatory  
16 discovery. Accordingly, the Parties respectfully request that the Court enter an order extending the  
17 case deadlines as follows:

18 1. The case is stayed to enable the Parties to continue to engage in settlement  
19 discussions.

20 2. Defendant's deadline to file a response to the Complaint shall be extended from  
21 October 13, 2022 to December 7, 2022; Plaintiff's deadline to file any opposition to the motion shall  
22 be January 9, 2023; Defendant's deadline to file any reply in support of the motion shall be  
23 February 6, 2023; and the hearing on the motion shall be scheduled for February 23, 2023.

24 3. In the event the Parties continue to make progress towards settlement and  
25 require a further stay, the Parties shall submit to the Court an additional joint report concerning the  
26 status of the Parties' efforts to resolve the case and requesting a further stay on or before  
27 November 30, 2022.  
28

4. Nothing in this stipulation is intended, or shall be deemed, to waive or otherwise prejudice any Party's rights, claims, defenses, motions, or objections (whether to jurisdiction, service, or otherwise) in this case.

Dated: October 6, 2022

Respectfully submitted,

/s/ Diane L. McGimsey

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**IT IS SO ORDERED.**

Dated: November 4, 2022

  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE